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Computer & Communications Industry Association

July 8, 2008

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

**Re: WT Docket No. 07-195
Service Rules for Advanced Wireless Services in the 2155-2175 MHz Band**

Dear Ms. Dortch:

The Computer & Communications Industry Association ("CCIA") writes to urge the Commission to supervise and consider the results of ongoing field testing of wireless service in the above-captioned proceeding.

CCIA represents a diverse group of companies in the computer, Internet services and information technology industries. CCIA shares the Commission's goal of encouraging the deployment of broadband networks and services, and we believe that the 2155-2180 MHz band ("AWS-3 band") can play an important role in meeting this goal. In a proceeding such as this one, the Commission must fully consider the interests of the public and all affected parties. In particular, given the complex technical issues at issue here, we believe that the Commission should ensure that licensees in the adjacent AWS-1 band and their customers are protected against harmful interference. Empirical testing can provide a scientific basis for appropriate interference protections. Testing need not be, and should not be, open-ended or unreasonably delay this proceeding.

We hope and assume the interference issues will be resolved. However, CCIA is also concerned about the First Amendment, privacy, and net neutrality implications of a mandatory filtering requirement. Forcing licensees to inspect and make judgments about the content of material transiting a broadband network, as opposed to enabling end users to employ blocking, is problematic. From a practical standpoint, the difficulties with identifying unacceptable content could lead to overbroad blocking of legal content that would severely limit the value of the new wireless broadband service to most users. Thank you for considering our request. We look forward to continuing to work with the Commission on these important issues.

Sincerely,

CCIA
President and CEO

cc: Honorable Kevin, Martin, Chariman

Honorable Michael J. Copps, Commissioner
Honorable Jonathan S. Adelstein, Commissioner
Honorable Deborah Taylor Tate, Commissioner
Honorable Robert M. McDowell, Commissioner